

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION - CLEVELAND

RADHAKRISHNAN RAMAMURTHY, et al.,)	CASE NO.
)	
)	
Plaintiffs,)	JUDGE
)	
v.)	
)	<u>NOTICE OF REMOVAL TO</u>
STILLWATER INSURANCE)	<u>FEDERAL COURT</u>
COMPANY, et al.,)	
)	
)	
Defendants.		

Please take notice that the Defendants, Stillwater Insurance Company and Stillwater Property and Casualty Insurance Company, hereby remove this action from the Cuyahoga County Court of Commons Pleas to the United States District Court for the Northern District of Ohio, Eastern Division, based upon the following:

1. On January 20, 2017, Plaintiffs filed their Complaint for damages and declaratory judgment in the Cuyahoga County Court of Common Pleas, Case No. CV 17 874726, alleging breach of contract and bad faith against Defendants for the denial of certain damages and costs allegedly incurred by Plaintiffs related to damage to their residence in January 2015.
2. On January 25 and 26, 2017, Defendants were served with a copy of the Summons and Complaint.
3. Plaintiffs alleged in their Complaint that venue is proper in Cuyahoga County, Ohio as the property at issue herein is located in Solon, Cuyahoga County, Ohio.
4. Defendant Stillwater Insurance Company is a California Corporation with its principal place of business in Jacksonville, Florida.

5. Defendant Stillwater Property and Casualty Insurance Company is a New York Corporation with its principal place of business in Jacksonville, Florida.

6. As there is complete diversity of citizenship between Plaintiffs and Defendants and Plaintiffs are claiming damages in excess of \$75,000, this court has jurisdiction pursuant to 28 U.S.C. § 1332.

7. Accordingly, this matter is hereby removed to the United States Court for the Northern District of Ohio, Eastern Division, pursuant to 28 U.S.C. §§ 1441 and 1446.

8. Defendants attach hereto a copy of Plaintiffs' Complaint and Copies of all other papers filed in the Cuyahoga County Court of Common Pleas in accordance with 28 U.S.C. 1446(a).

9. In accordance with 28 U.S.C. 1446(b), this Notice of Removal is being filed within thirty (30) days of service upon Defendants of the initiating case documents setting for the claims for relief upon which this matter is based.

Respectfully submitted,

MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN

By: *1/s/ David J. Fagnilli*

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CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2017, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN

By: /s/ David J. Fagnilli

DAVID J. FAGNILLI (0032930)
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